

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

Routine or predictable emissions during Startup, Shutdown, and Maintenance (SSM): Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

This Title V operating permit minor modification application is for the use of five spray evaporators to reduce water volume in the existing Sigma Mesa evaporation basins. These synthetically-lined evaporation basins are located within Technical Area 60. The basins are intended for use to evaporate a specific treated waste water discharge from the LANL Sanitary Effluent Treatment Facility or SERF.

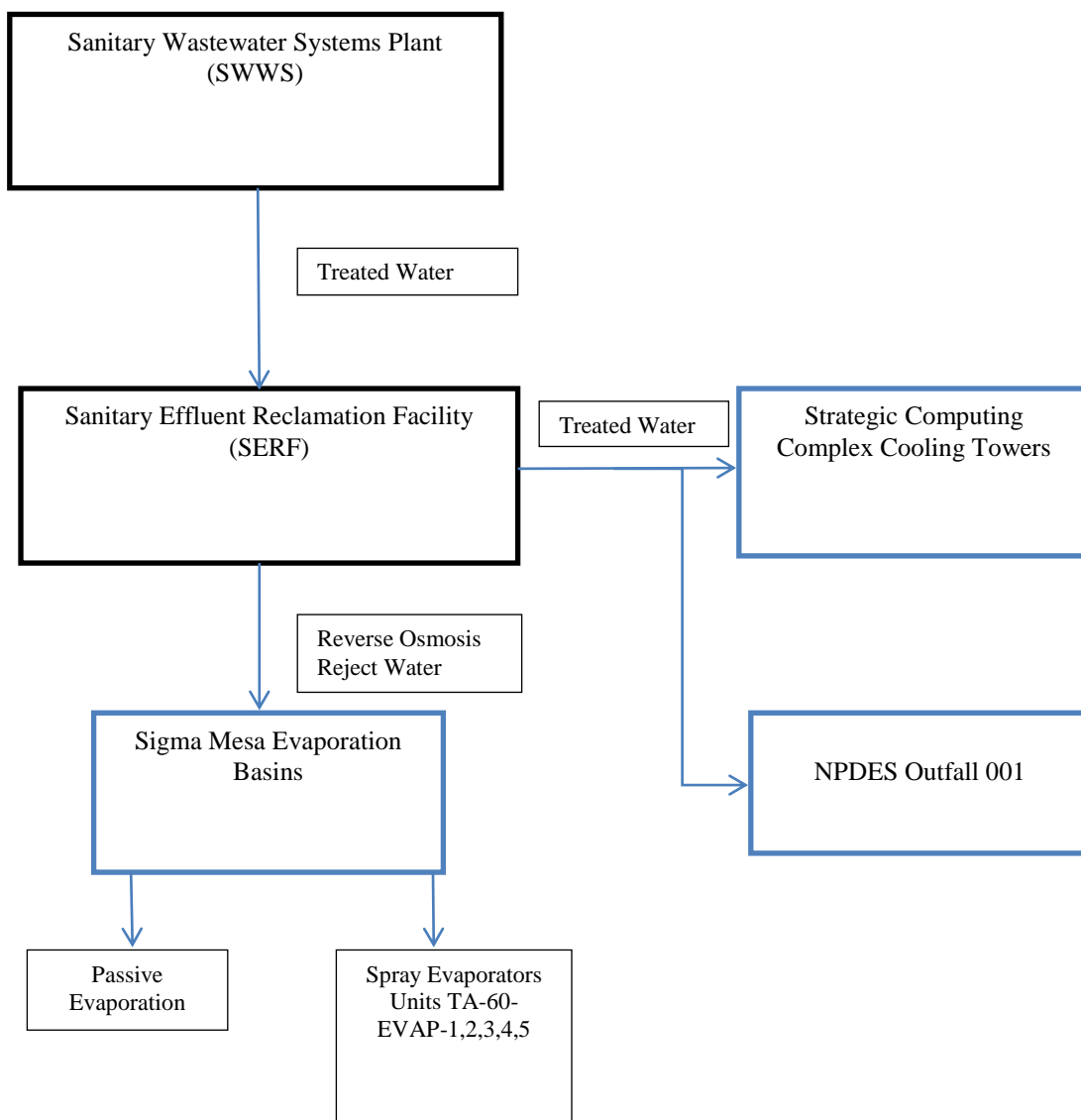
The SERF facility processes further treated LANL sanitary wastewater effluent for beneficial reuse, and is intended to conserve potable water, reduce wastewater discharges to the environment, and achieve compliance with National Pollutant Discharge Elimination System (NPDES) permit limitations. Treatment is performed using a combination of chemical precipitation, microfiltration, and reverse osmosis to remove silica and trace quantities of PCBs from the wastewater effluent. The primary chemicals used in the precipitation process (magnesium chloride/ferric chloride/sodium hydroxide), when dissociated in water, become dissolved solids which elevate the conductivity of the water considerably. These dissolved constituents have to be removed through the reverse osmosis process, which rejects the dissolved solids (primarily NaCl, or common salt). This stream of concentrated dissolved solids is then discharged to the Sigma Mesa evaporation basins. The reason for the high concentration of dissolved solids in the reject water is that high levels of silica in the effluent require substantial chemical dosing for effective removal, and then this stream is further concentrated in the treatment process as clean water which is separated from the resulting reverse osmosis reject stream. As the purpose of the SERF facility is to recover high percentages of reusable water, the relatively small percentage of reject water contains the original amount of dissolved solids in a much smaller volume, and thus is more highly concentrated.

In addition to trace quantities of hazardous or toxic air pollutants in the treated water, the only other potential air pollutant emitted from this process is particulate matter from evaporated water droplets in the evaporator's plume. Due to the high total dissolved content (TDS) of the water, potential particulate matter emissions of all size diameters is high assuming all TDS present evaporates into the air. However, only a small portion of total potential particulate matter emitted is regulated and of environmental concern. The calculations included with this application demonstrate emissions of regulated particulate matter are primarily less than 30 microns in diameter (PM₃₀), considered by NMED to represent total suspended particulate (TSP). Annual emissions of PM₁₀ are estimated to be less than one ton per year. No emissions of PM_{2.5} are projected to be present.

Section 4

Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.



Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

See next page. Note sprayers are portable and float within basins. Specific locations within evaporation basins are not identified.

Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

Significant Figures:

A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.

B. At least 5 significant figures shall be retained in all intermediate calculations.

C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device

regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

The attached calculations included on the UA2 form are primarily for particulate matter but also include any measured trace quantities of any detected hazardous or toxic air pollutant. Total dissolved solids (TDS) and trace compound concentrations present in the treated waste water evaporative basins were obtained by water sample analysis by an independent laboratory and reported to LANL in a December 9, 2015 report. The highest value reported for any compound was used in the calculations. Potential to emit emission estimates assume all (5) evaporative sprayers operate 8,760 hours per year at the maximum design water pump rate derated for altitude per the vendor's recommendation of 2.3% per 1000 feet of elevation.

In order to determine what percentage of total particulate matter is of a size of environmental concern and regulated (less than 30 microns in diameter referenced as PM30), the water droplet size distribution created by the Model 120F evaporator was obtained from the vendor. The vendor contracted with a test organization to conduct testing and an analysis to provide this information. LANL obtained from the vendor the actual measured test data (water droplet size and numbers present) from the laboratory test in order to calculate regulated particulate matter percentages. Using the water droplet test data, together with equations from NMED's technical memorandum regarding estimating particulate matter emissions from evaporation of water droplets from cooling towers, the percent values of PM30, PM10, and PM2.5 were obtained and applied to the total potential to emit value for particulate matter. Less than 1% of total particulate matter constitutes PM30. Potential emissions of PM10 are below Title V insignificant activity criteria of 1 ton per year for all five sprayers. No emissions of PM2.5 are estimated to occur.

In general, for particulate matter formed by the evaporation of water droplets, high TDS values as well as larger water droplets are conducive to formation of large diameter particles. The TDS in the evaporated water is high due to the salt content. Water droplets formed by the evaporator's mechanical fan shearing are also large when compared to droplets formed by an evaporator using a nozzle and atomizer.

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO₂e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO₂e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO₂e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at <http://www.epa.gov/ttn/chief/ap42/index.html>
- EPA's Internet emission factor database WebFIRE at <http://cfpub.epa.gov/webfire/>
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.

- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at <http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases>:

Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO₂ over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. **(20.2.70.7 NMAC, 20.2.74.7 NMAC)**. You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

The evaporative sprayers do not produce greenhouse gas emissions.

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☐ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
 - ☐ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
 - ☐ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
 - ☐ If an older version of AP-42 is used, include a complete copy of the section.
 - ☐ If an EPA document or other material is referenced, include a complete copy.
 - ☐ Fuel specifications sheet.
 - ☐ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.
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Information used to determine emissions is noted on the UA2 calculations sheet.

Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

| | |
|--|--|
| The UTM or Longitudinal coordinate system on both axes | An indicator showing which direction is north |
| A minimum radius around the plant of 0.8km (0.5 miles) | Access and haul roads |
| Topographic features of the area | Facility property boundaries |
| The name of the map | The area which will be restricted to public access |
| A graphical scale | |

See next page.

Section 9 – Not Applicable for Title V

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)

(This proof is required by: 20.2.72.203.A.14 NMAC “Documentary Proof of applicant’s public notice”)

☐ **I have read the AQB “Guidelines for Public Notification for Air Quality Permit Applications”**

This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant’s Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ☐ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
 2. ☐ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
 3. ☐ A copy of the property tax record (20.2.72.203.B NMAC).
 4. ☐ A sample of the letters sent to the owners of record.
 5. ☐ A sample of the letters sent to counties, municipalities, and Indian tribes.
 6. ☐ A sample of the public notice posted and a verification of the local postings.
 7. ☐ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
 8. ☐ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
 9. ☐ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 10. ☐ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 11. ☐ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.
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Section 10

Written Description of the Routine Operations of the Facility

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

The evaporator model chosen is the SMI 120F. This model is a floating mechanical evaporator designed for use in small ponds where control of wet or dry particulate drift can be optimized. The plume height and direction can be varied in order to adjust water droplet drift and create maximum evaporation rates. The floating design allows the device to be used on the pond surface rather than adjacent to the pond which minimizes drift onto a land surface. This evaporator type utilizes a high-speed fan to mechanically shear the injected water into droplets which are then projected into the plume for evaporation. Operation of the sprayers will be dependent on atmospheric conditions (wind speed and temperature) to achieve acceptable evaporation rates. According to specific needs, more than one sprayer may be used in a given pond to enhance evaporation at a particular basin.

Section 11

Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe):
Five (5) SMI Model 120 evaporative sprayers.

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

☐ Yes ☒ No

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

☐ Yes ☒ No

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☐ Yes ☒ No

C. Make a determination:

☐ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.

☒ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe): **This is a minor permit modification to existing Title V Permit P100-R2. The entire source consists of all sources in Permit P100-R2 plus the new evaporative sprayers subject to this minor modification. Existing equipment and sources within Permit P100-R2 are not subject to this minor modification.**

Section 12-Not Applicable for Title V

Section 12.A

PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74.AG and 20.2.74.200 NMAC and to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

A. This facility is:

- ☒ a minor PSD source before and after this modification (if so, delete C and D below).
- ☐ a major PSD source before this modification. This modification will make this a PSD minor source.
- ☐ an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
- ☐ an existing PSD Major Source that has had a major modification requiring a BACT analysis
- ☐ a new PSD Major Source after this modification.

B. This facility **[is or is not]** one of the listed 20.2.74.501 Table I – PSD Source Categories. The “project” emissions for this modification are **[significant or not significant]**. **[Discuss why.]** The “project” emissions listed below **[do or do not]** only result from changes described in this permit application, thus no emissions from other **[revisions or modifications, past or future]** to this facility. Also, specifically discuss whether this project results in “de-bottlenecking”, or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:

- a. NOx: **XX.X** TPY
- b. CO: **XX.X** TPY
- c. VOC: **XX.X** TPY
- d. SOx: **XX.X** TPY
- e. TSP (PM): **XX.X** TPY
- f. PM10: **XX.X** TPY
- g. PM2.5: **XX.X** TPY
- h. Fluorides: **XX.X** TPY
- i. Lead: **XX.X** TPY
- j. Sulfur compounds (listed in Table 2): **XX.X** TPY
- k. GHG: **XX.X** TPY

Section 13

Discussion Demonstrating Compliance with Each Applicable State & Federal Regulation

Provide a discussion demonstrating compliance with applicable state & federal regulation. If there is a state or federal regulation (other than those listed here) for your facility's source category that does not apply to your facility, but seems on the surface that it should apply, add the regulation to the appropriate table below and provide the analysis. Examples of regulatory requirements that may or may not apply to your facility include 40 CFR 60 Subpart OOO (crushers), 40 CFR 63 Subpart HHH (HAPs), or 20.2.74 NMAC (PSD major sources). We don't want a discussion of every non-applicable regulation, but if there is questionable applicability, explain why it does not apply. All input cells should be filled in, even if the response is 'No' or 'N/A'.

In the "Justification" column, identify the criteria that are critical to the applicability determination, numbering each. For each unit listed in the "Applies to Unit No(s)" column, after each listed unit, include the number(s) of the criteria that made the regulation applicable. For example, TK-1 & TK-2 would be listed as: TK-1 (1, 3, 4), TK-2 (1, 2, 4). Doing so will provide the applicability criteria for each unit, while also minimizing the length of these tables.

As this table will become part of the SOB, please do not change the any formatting in the table, especially the width of the table.

If this application includes any proposed exemptions from otherwise applicable requirements, provide a narrative explanation of these proposed exemptions. These exemptions are from specific applicable requirements, which are spelled out in the requirements themselves, not exemptions from 20.2.70 NMAC or 20.2.72 NMAC.

There is no applicable state or federal regulation which applies to the proposed evaporative sprayers' operation.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

- ✓ **Title V Sources** (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies** defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☐ **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown** defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☐ **Title V** (20.2.70 NMAC), **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.
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Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

There are no alternative operating scenarios proposed.

Section 16

Air Dispersion Modeling

- 1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
- 2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.
- 3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

| What is the purpose of this application? | Enter an X for each purpose that applies |
|--|--|
| New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above. | |
| New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions. | |
| Reporting existing pollutants that were not previously reported. | |
| Reporting existing pollutants where the ambient impact is being addressed for the first time. | |
| Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above. | X NSR-2195B-M2 |
| Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC) | |
| Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements. | |
| Other: i.e. SSM modeling. See #2 above. | |
| This application does not require modeling since this is a No Permit Required (NPR) application. | |
| This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC). | |
| This application does not require modeling according to 20.2.70.7.E (11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines. | X |

Check each box that applies:

- ☐ See attached, approved modeling **waiver for all** pollutants from the facility.
- ☐ See attached, approved modeling **waiver for some** pollutants from the facility.
- ☐ Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
- ☐ Attached in UA4 is a **modeling report for some** pollutants from the facility.

√ No modeling is required. The New Mexico TSP ambient standard is not a Title V applicable requirement. The PM10 potential emission rate is 0.01 lbs/hr per sprayer. There are no emissions of PM2.5 estimated to occur.

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

The evaporative sprayers are not operational and have no compliance test history.

Section 18 –Not Applicable for Title V

Addendum for Streamline Applications

Do not print this section unless this is a streamline application.

Section 19

Requirements for Title V Program

Do not print this section unless this is a Title V application.

Who Must Use this Attachment:

- * Any major source as defined in 20.2.70 NMAC.
 - * Any source, including an area source, subject to a standard or other requirement promulgated under Section 111 - Standards of Performance for New Stationary Sources, or Section 112 Hazardous Air Pollutants, of the 1990 federal Clean Air Act ("federal Act"). Non-major sources subject to Sections 111 or 112 of the federal Act are exempt from the obligation to obtain an 20.2.70 NMAC operating permit until such time that the EPA Administrator completes rulemakings that require such sources to obtain operating permits. In addition, sources that would be required to obtain an operating permit solely because they are subject to regulations or requirements under Section 112(r) of the federal Act are exempt from the requirement to obtain an Operating Permit.
 - * Any Acid Rain source as defined under title IV of the federal Act. The Acid Rain program has additional forms. See <http://www.env.nm.gov/aqb/index.html>. Sources that are subject to both the Title V and Acid Rain regulations are encouraged to submit both applications simultaneously.
 - * Any source in a source category designated by the EPA Administrator ("Administrator"), in whole or in part, by regulation, after notice and comment.
-
-

19.1 - 40 CFR 64, Compliance Assurance Monitoring (CAM) (20.2.70.300.D.10.e NMAC)

Any source subject to 40CFR, Part 64 (Compliance Assurance Monitoring) must submit all the information required by section 64.7 with the operating permit application. The applicant must prepare a separate section of the application package for this purpose; if the information is already listed elsewhere in the application package, make reference to that location. Facilities not subject to Part 64 are invited to submit periodic monitoring protocols with the application to help the AQB to comply with 20.2.70 NMAC. Sources subject to 40 CFR Part 64, must submit a statement indicating your source's compliance status with any enhanced monitoring and compliance certification requirements of the federal Act.

Part 64 does not apply to the evaporative sprayers.

19.2 - Compliance Status (20.2.70.300.D.10.a & 10.b NMAC)

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

The most recent Title V Compliance Certification Report was submitted in January 2016 and indicates compliance with all applicable requirements. One permit deviation without any excess emission was noted and corrective action was taken to resolve.

19.3 - Continued Compliance (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

This facility will continue to be in compliance with requirements for which it is in compliance at the time of this permit application, and will in a timely manner, meet additional requirements that become effective during the permit term.

19.4 - Schedule for Submission of Compliance (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

The proposed schedule for submission of the Annual Compliance Certification Report is the schedule currently in Section A109 of Permit P100-R2. The schedule requires submittal of the report within 30 days of the end of the 12-month reporting period which starts on January 1st each year.

19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? ☒ **Yes** ☐ **No**
 2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? ☒ **Yes** ☐ **No**
(If the answer is yes, describe the type of equipment and how many units are at the facility.)
There are 262 refrigeration units in active inventory at this facility containing a charge of 50 pounds or more of refrigerant. There are various duty types of units such as chillers and heating and air conditioning units. Nearly 85% of the units are used for comfort cooling purposes. The remaining percentage consists of units that are tied to different processes. An example would be chillers that cool computer rooms.
 3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? ☒ **Yes** ☐ **No**
 4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.) 40 CFR Part 82, Subparts B, F, H and I.
-

This facility is in compliance with all Title VI, Section 608 and Section 609 requirements.

19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)

A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

B. Compliance plan: (20.2.70.300.D.11.B NMAC)

A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

C. Compliance schedule: (20.2.70.300D.11.c NMAC)

A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

D. Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)

A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)

If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

NOTE: The Acid Rain program has additional forms. See <http://www.env.nm.gov/aqb/index.html>. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

A compliance plan and schedule is not required for this facility.

19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

This facility is not subject to the Section 112(r) requirements.

19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

This facility is within 80 km of the following Indian tribes and pueblos and a local pollution control program as follows with distances indicated in km:

Taos Pueblo (69), Picuris Pueblo (56), Jicarilla Apache (67), Ohkay Owingeh Pueblo (19), Santa Clara Pueblo (10), San Ildefonso Pueblo (5), Pojoaque Pueblo (13), Nambe Pueblo (24), Tesuque Pueblo (19), Cochiti Pueblo (13), Santa Domingo Pueblo (27), Zia Pueblo (30), San Felipe Pueblo (38), Santa Ana Pueblo (40), Jemez Pueblo (19), Sandia Pueblo (61), Laguna Pueblo (77), Bernalillo County - Albuquerque Air Quality Division (56).

19.9 - Responsible Official

Provide the Responsible Official as defined in 20.2.70.7.AD NMAC: Michael T. Brandt

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

Enclosed:

1. Vendor specification sheet for Model 120 Evaporative Sprayer.

Section 21

Addendum for Landfill Applications

Do not print this section unless this is a landfill application.

Landfill Applications are not required to complete Sections 1-C and 1-E. All other Sections are required.

21-A: Landfill Information

| | | | |
|----|--|--|---|
| 1 | How long will the landfill be operated? | | |
| 2 | Maximum operational hours per year: | | |
| 3 | Landfill Operating hours (open to the public) M-F: | Sat. | Sun. |
| 4 | Landfill Design Capacity (Tons): | Megagrams: | Cubic meters: |
| 5 | Landfill NMOC Emission Rate | <input type="checkbox"/> Less than 50mg/year | <input type="checkbox"/> Greater than 50mg/year |
| 6 | Annual Waste Acceptance Rate: | | |
| 7 | Is Petroleum Contaminated Soil Accepted? | If so, what is the annual acceptance rate? | |
| 8 | NM Solid Waste Permit No.: | SW Permit Date: | |
| 9 | Describe NM Solid Waste Permit, Status, and Type of waste deposited at landfill | | |
| 10 | Describe briefly any process(es) or any other operations conducted at the landfill | | |

21-B: NMOC Emissions

| | |
|---|----------------------------------|
| 1 | NMOC Emissions based on LandGEM: |
| 2 | Tier 1: |
| 3 | Tier 2: |
| 4 | Tier 3: |

EMISSIONS (refer to 40 CFR 60.754 for test methods and procedures or AP-42 Sect.2.4)

Include the latest LandGEM calculations and/or testing results.

Facilities that have a Landfill GCCS complete the following section.

| 21-C: Landfill Gas Collection and Control System (GCCS) Design Plan | | Yes | No |
|--|---|------------|-----------|
| 1 | Was the GCCS design certified by a P.E? | | |
| 2 | Was the Design System Plan submitted within 12 months of the first report of the site exceeding 50Mg/yr? | | |
| 3 | Is the GCCS planned to be operational within 30 months of the first report of the site exceeding 50 Mg/yr? | | |
| 4 | Does the GCCS comply with the 2 year/5 year rule? | | |
| 5 | Is the design life of the GCCS more than 15 years? | | |
| 6 | Have measures been taken in the GCCS Plan to control lateral gas migration? | | |
| 7 | If the GCCS design is for a passive system (non enhanced), are the necessary liners in place? | | |
| 8 | Is adequate density of collectors planned? | | |
| 9 | Is the Landfill gas conveyance system sized properly? | | |
| 10 | Is the landfill gas planned to be routed to a control device? (Utility flare, enclosed flare or other) | | |
| 11 | If the control device is a flare, does it include continuous temperature monitoring and a flow measurement device? | | |
| 12 | Is the flare sized properly? | | |
| 13 | Does the GCCS include fittings to allow connection of additional collectors if necessary in the future? | | |
| 14 | Does the wellhead for all collectors include at least one sample port and one thermometer port? | | |
| 15 | Operational Issues: 1. Will the GCCS be operated at a vacuum at every well? 2. Will the GCCS be operated at the appropriate gas temps? 3. Will the GCCS be operated with minimal amounts of air? 4. Will monitoring be done monthly to conform with these operational issues? 5. Will surface emissions monitoring be completed? 6. Will the blower automatically be shut down if the control device is inoperable? | | |
| 16 | Was the design diagram for the GCCS, including the flare, blower, and well location attached to the permit application? | | |

Section 22: Certification

Company Name: Los Alamos National Security, LLC

I, Michael T. Brandt , hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this ____ day of _____, _____, upon my oath or affirmation, before a notary of the State of

New Mexico.

*Signature

Date

Michael T. Brandt
Printed Name

Associate Director, ADESH-ES&H
Title

Scribed and sworn before me on this ____ day of _____, _____.

My authorization as a notary of the State of _____ expires on the

_____ day of _____, _____.

Notary's Signature

Date

Notary's Printed Name

*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.